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BLUE CROSS AND BLUE SHIELD OF NORTH
CAROLINA

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SETON MEDICAL CENTER, a California
non-profit religious corporation,

Plaintiff,

vs.

BLUE CROSS AND BLUE SHIELD OF
NORTH CAROLINA, a North Carolina
non-profit corporation; and DOES 1
THROUGH 25, INCLUSIVE,

Defendants.

Case No. 15-cv-06254-JCS

**STIPULATION TO EXTEND
DEFENDANT BLUE CROSS AND BLUE
SHIELD OF NORTH CAROLINA'S
TIME TO ANSWER, MOVE OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

Pursuant to Civil Local Rule 6-1(a), Plaintiff, Seton Medical Center ("Plaintiff"),
and Defendant Blue Cross and Blue Shield of North Carolina ("BCBSNC"), by and through
their respective counsel of record, hereby submit this stipulation based on the following:

Plaintiff served its state court Complaint on November 25, 2015;

BCBSNC removed this civil action, Case No. CIV536368, from the Superior Court
of the State of California, for the County of San Mateo, to the United States District Court,
for the Northern District of California, based upon diversity on December 29, 2015;

A responsive pleading to the Complaint was originally due to be filed and served on
behalf of BCBSNC on or before January 5, 2016;

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The parties stipulated to, and the Court granted, an extension of time of an additional 27 days to and including February 1, 2016 for BCBSNC to answer, move or otherwise respond to the Complaint;

The parties subsequently stipulated to, and the Court granted, an extension of time of an additional 30 days to and including March 1, 2016 for BCBSNC to answer, move or otherwise respond to the Complaint;

The parties are engaged in settlement negotiations and in order to facilitate further settlement discussions, BCBSNC has requested and Plaintiff has agreed to an additional 15 days to and including March 15, 2016 for BCBSNC to answer, move or otherwise respond to the Complaint;

The next Court ordered deadline is on March 11, 2016 for the parties to meet and confer re initial disclosures and early settlement. An additional 15 days for BCBSNC to answer or respond to Plaintiff's Complaint will not alter the date of any event or any deadline already fixed by Court order, as the parties will meet and confer notwithstanding any extension to respond to the Complaint;

Therefore, IT IS HEREBY STIPULATED by and between Plaintiff and BCBSNC, by and through their respective attorneys of record, that BCBSNC shall have until on or before March 15, 2016 to answer, move or otherwise respond to Plaintiff's Complaint.

Dated: February 24, 2016

STEPHENSON, ACQUISTO & COLMAN
Melanie Joy Stephenson
Barry Sullivan
Richard A. Lovich
Karlene J. Rogers Aberman
Christine V. Nitoff

By: /s/ Christine V. Nitoff

Christine V. Nitoff
Attorneys for Plaintiff
SETON MEDICAL CENTER

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2 Dated: February 24, 2016

VON BEHREN & HUNTER LLP
William E. von Behren
Joann Lee

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5 By: /s/ Joann Lee

Joann Lee
Attorneys for Defendant
BLUE CROSS AND BLUE SHIELD
OF NORTH CAROLINA

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8
9 Dated: 2/25/16



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